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MEMO ENDORSED

May 28, 2010

The Honorable Richard Sullivan
United States District Court
Southern District of New York
500 Pearl Street, Room 640
New York, New York 10007

Re: United States v. Zvi Goffer, et al.,
Criminal Matter No. 10-56

USDS SDNY
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DOC #:
DATE FILED: 6/2/10

Dear Judge Sullivan:

I respectfully submit the enclosed copy of Defendants' Joint Motion for Discovery, with a set of unredacted supporting exhibits. The Motion with redacted exhibits was filed via ECF earlier this evening. As co-defendant's counsel Michael Ross indicated in his letter of May 27, 2010, although no protective order is in place concerning these items, three of the supporting exhibits include material that we believe should be filed under seal to prevent disclosure of wiretap and personal information. Specifically, these exhibits are Exhibit B, Affidavit in Support of the Application for Authorization to Intercept Wire Communications (over the Drimal telephone) dated November 15, 2007; Exhibit C, a chart summarizing the wiretap applications and Target Subjects named in those applications; and Exhibit N, Affidavit in Support of the Application for Authorization to Intercept Wire Communications (over the Hardin telephone).

We respectfully request permission to file a copy of the Motion with unredacted attachments under seal. Thank you for your attention to this matter.

SO ORDERED
Dated: 6/1/10

RICHARD J. SULLIVAN
U.S.D.J.

Respectfully submitted,

Cynthia M. Monaco

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Enclosures

Cc: Defense counsel (by email, w/o enclosures)
AUSA Brodsky (w/unredacted copies of Exhibits B, C, and N)